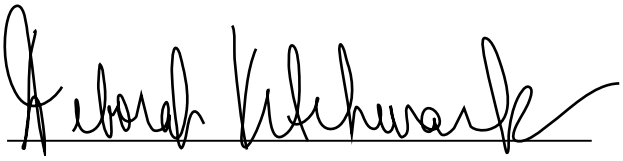
IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	No. 1:19-md-2875-RBK Hon. Robert Kugler Hon. Joel Schneider **DECLARATION OF DEBORAH KETCHMARK**

I, Deborah Ketchmark, declare as follows:

1. I am a Director with the Review Solutions Department with the company Consilio, which has been retained by Defendants Teva Pharmaceuticals USA, Inc., Teva Pharmaceutical Industries Ltd., Actavis LLC, Actavis Pharma, Inc., and Arrow Pharm (Malta) Ltd. (collectively, "the Teva Defendants") in the above-captioned matter.
2. To date, in connection with this matter, Consilio and Greenberg Traurig have manually reviewed 668,385 electronic documents, 164,028 of which are for the six "high-priority" custodians.
3. Consilio spent 330.6 hours reviewing 15,000 documents which the CMML system deemed likely to be non-responsive, and found only 70 responsive documents during this review. The cost of this review of 15,000 documents was $13,885.
4. Currently, 260,375 documents remain to be reviewed for the six "high-priority" custodians. To review these documents by the November 29, 2020 production deadline would require Teva to retain 43 reviewers, for a total estimated 5,424 hours in 3.5 weeks.
5. Consilio estimates the above review of 260,375 documents would cost $228,000.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.



October 8, 2020

Name (Signature) Executed on

Deborah Ketchmark

Name (Printed)